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Syncom Media Group, Inc.

Syncom Media Group is the licensee of KCIN-LP, Denver, CO

Its maximum ERP is 68.7 kW. The antenna has 1.75° degrees electrical downtilt, which results in an ERP of 38.0 kW on the horizon.

The NPRM explicitly proposes to protect UHF LPTV stations inside their 74 dBµ contour as derived from the F50/50 curves. The FCC recognizes that the F50/50 curves are not a reliable method of predicating where useful coverage will be found.[1]

The attached plot shows the F50/50 74 dBµ contour and the more realistic service area based on the Longley-Rice terrain dependent calculation in accordance with Office of Engineering and Technology Bulletin 69.

Even protection out to 64 dBµ will short change fringe area viewers. As may be seen from the plot the 64 dbµ coverage goes out beyond the metropolitan area into the rual area where background noise is low and man made interference at UHF frequencies is minimal. It is probable that the protected field strength should go down to a number more like 54 dBµ if reception by the public is not to be lost.

The proposed protection plan involves the compiling of a database of vacant channels. Only an organization that was actively using unlicensed radiators would have any incentive for compiling and maintaining such a database. The starting point for such a database presumably would be the FCC's CDBS database. Aside from the problem of keeping the CDBS database accurate and up to date asking a proponent to be responsible for the secondary database that controls the unlicensed radiators is comparable to asking the fox to guard the hen house.

The proposal would rely on tamper-proof hardware but it is hard to believe this would be truly effective to the degree needed. The unlicensed user has no contact with the FCC and little incentive to comply. This is in contrast to holder of a license who has a great deal to lose if the rules are not obeyed.

Another problem is that a moving source of interference is very hard to identify. If identification depends upon a transmitted identification (call sign or equivalent) it would probably be necessary to record the offending signal for analysis. The rulemaking is silent on whether the identification would be in a format that could be decoded readily, such as Morse code or whether it would be embedded in the data and retrievable only with a compatible demodulator. The proposal is based on speculative hardware and a questionable database. Considering the possibility of a major adverse impact from thousands of the "unlicensed radiators" prototype hardware and a demonstration database should be field tested before the plan is put into operation.

[1] §73.683 states in relevant part: "These [contours] are specified as Grade A and Grade B and indicate the approximate extent of coverage over average terrain in the absence of interference from other television stations. Under actual conditions the true coverage may vary greatly from these estimates because the terrain over any specific path is expected to be different from the average terrain on which the field strength charts were based.